

1 EDMUND G. BROWN, JR.  
Attorney General of California  
2 JAY C. RUSSELL (CA SBN 122626)  
Supervising Deputy Attorney General  
3 JOSE A. ZELIDON-ZEPEDA (CA SBN 227108)  
Deputy Attorney General  
4 Jose.ZelidonZepeda@doj.ca.gov  
NEAH HUYNH (CA SBN 235377)  
5 Deputy Attorney General  
Neah.Huynh@doj.ca.gov  
6 455 Golden Gate Avenue, Suite 11000  
San Francisco, California 94102-5781  
7 Telephone: 415.703.5781  
Facsimile: 415.703.5843

8  
Attorneys for Defendants  
9 J. RODRIGUEZ, E. CAMARENA, J. PARRA,  
D. VEGA, and SERGEANT KIRCHER

10 MATTHEW I. KREEGER (CA SBN 56398)  
MKreeger@mofo.com  
11 CATHARINE B. BAKER (CA SBN 210011)  
CBaker@mofo.com  
12 JANELLE SAHOURIA (CA SBN 253699)  
JSahouria@mofo.com  
13 MORRISON & FOERSTER LLP  
425 Market Street  
14 San Francisco, California 94105-2482  
Telephone: 415.268.7000  
15 Facsimile: 415.268.7522

16 Attorneys for Plaintiff  
17 THOMAS RAY WOODSON

18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA  
20 OAKLAND DIVISION

21 THOMAS RAY WOODSON,  
22 Plaintiff,

23 v.

24 J. RODRIGUEZ, *et al.*,  
25 Defendants.

Case No. 4:07-CV-04925-CW

**STIPULATION AND [PROPOSED]  
ORDER RESCHEDULING  
SETTLEMENT CONFERENCE**

Judge: The Honorable Donna M. Ryu

Complaint Filed: September 21, 2007  
Trial Date: June 27, 2011

For the reasons set forth below, counsel for Plaintiff Thomas R. Woodson and counsel for Defendants J. Rodriguez, E. Camarena, J. Parra, D. Vega, and Sergeant Kircher stipulate to vacate and reschedule the settlement conference currently set for September 3, 2010.

1. The settlement conference in this case is currently set for September 3, 2010;

2. Counsel for Mr. Woodson, Catharine B. Baker, has to take a leave of absence from her work with Morrison & Foerster LLP from August 1, 2010 through approximately November 1, 2010, for personal reasons;

3. The parties agreed that the interests of the parties and judicial economy would be best served by continuing the case management dates other than the trial and final pre-trial conference dates, including the settlement conference, as set forth below;

4. On July 26, 2010, Judge Claudia Wilken entered a stipulated Order Resetting Case Management Dates (the "July 26, 2010 Order"), attached hereto as Exhibit A, which rescheduled dates as follows:

Event	Prior Deadline	New Deadline
Deadline to add parties or claims	9/1/10	11/19/10
ADR session to be held by	10/1/10 (settlement conference currently set for 9/3/10)	12/17/10
Fact discovery cut-off	10/1/10	12/17/10
Expert disclosures (names, reports)	10/29/10	1/14/11
Expert rebuttal reports	11/19/10	2/1/11
Expert discovery cut-off	12/17/10	2/18/11
MSJ Hearing, CMC	2/3/11 at 2:00 p.m.	4/7/11 at 2:00 p.m..
Pretrial Conference	6/14/11 at 2:00 p.m.	same
Trial	6/27/11	same

1           5. The July 23, 2010 Order also provided, as stipulated, that unless the parties agree  
2 otherwise in writing, no written discovery directed to any party or non-party propounded after  
3 July 23, 2010 shall be due before November 1, 2010, and no depositions shall be taken until after  
4 November 1, 2010;

5           6. No depositions in this action have been taken since the parties conferred with the Court  
6 at the Scheduling Settlement Conference on June 29, 2010;

7           Accordingly, IT IS HEREBY STIPULATED AND AGREED by the parties, by and  
8 through their respective counsel, that:

9           1. The settlement conference scheduled for September 3, 2010, be taken off calendar.

10          2. The settlement conference shall be rescheduled for a date and time between  
11 ~~November~~ December 1, 2010 and December 17, 2010, subject to the availability of the Court.

12 //

13 //

14 //

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1           3.       The parties shall contact the Court on or before October 15, 2010, to reschedule  
2 the settlement conference.

3 Dated: July 27, 2010

Respectfully Submitted,

4 MATTHEW I. KREEGER  
5 CATHARINE B. BAKER  
6 JANELLE SAHOURIA  
MORRISON & FOERSTER LLP

7 By: .../s/ Catharine B. Baker....  
CATHARINE B. BAKER

8 Attorneys for Plaintiff  
9 THOMAS RAY WOODSON

10 Dated: July 27, 2010

11 JOSE A. ZELIDON-ZEPEDA  
12 NEAH HUYNH  
CALIFORNIA ATTORNEY GENERAL'S  
OFFICE

13 By: .../s/ Jose A. Zelidon-Zepeda.....  
14 JOSE A. ZELIDON-ZEPEDA

15 Attorneys for Defendants  
16 J. RODRIGUEZ, E. CAMARENA, J.  
17 PARRA, D. VEGA, AND SERGEANT  
KIRCHER

18 **PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.**

19 Dated: July 28, 2010

20   
HONORABLE JUDGE DONNA M. RYU  
21 United States Magistrate Judge  
22  
23  
24  
25  
26  
27  
28